REMARKS

In the Office Action, the Examiner indicated that Claims 1 through 27 are pending in the application and the Examiner rejected all claims. Independent claims 1, 12 and 19 have been amended herein to further define the invention as novel over the prior art. Specifically, the claims have been amended to further define a computational grid. Support for the Amendment can be found in paragraph [0006] as well as paragraph [0012].

Claim Rejections, 35 U.S.C. §§ 102 and 103

On page 4 of the Office Action, the Examiner rejected Claims 1-9 and 11-26 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent Application Publication No. 2004/0088688 to Hejlsberg et al. On page 17 of the Office Action, the Examiner rejected Claims 10 and 27 under 35 U.S.C. §103(a) as being unpatentable over Hejlsberg in view of U.S. Patent No. 6,789,252 to Burke et al.

The Present Invention

The present invention teaches automatically developing objects using a plurality of context derived models residing within a computational grid. An object meta language (OML) is used to allow a programmer to define an application. Using OML, the programmer creates a document describing the required object. Specifically, claim 1 recites "generating a description of an application; providing said description to a web service; parsing said description by said web service" (lines 3-5). In these limitations, the OML document is submitted to a group of context derived models residing at various computational nodes on the grid. Then, a web service is used to

parse the OML document and select the appropriate node. Specifically, Claim 1 further recites "locating a suitable coding module on a node contained within a computation grid wherein said computation grid includes a plurality of computers sharing computational resources; supplying said description to said node" (lines 6-7). Next, the OML document is provided to the selected node, which applies object description variables using a transform language to produce a defined output object. The defined output object is then returned to the programmer. Specifically, claim 1 finally recites "applying said description to said coding module to generate an output object; and returning said output object" (lines 8-9). By utilizing a computational grid, additional computing power from otherwise idle nodes is used, thereby improving the overall performance of the system.

U.S. Patent Application No. 2004/0088688 to Hejlsberg et al.

U.S. Patent Application No. 2004/0088688 to Hejlsberg et al. ("Hejlsberg") teaches a framework for writing a code generator based upon a constructed blueprint. A blueprint translator translates the blueprint into one or more classes of source code. The classes of newly generated source code can then be compiled. At compilation time, a compiler combines the generated classes with any user additions, and writes the code as if it were a single class. Later, if the blueprint is changed, the generated code can be safely updated without overwriting the user's additions. This provides a user a chance to embed certain capabilities into a code class and insure the additions will remain throughout any recompiling of the code classes based upon changes to the blueprints. The Examiner acknowledges that Hejlsberg does not disclose that IBM Websphere is used as the web service.

U.S. Patent No. 6,789,252 to Burke et al.

U.S. Patent No. 6,789,252 to Burke et al. ("Burke") teaches a method and system for providing an open and extensible object definition framework that manages business object definitions as specifications. This framework may be used to dynamically define any object that is to be processed by a computer. The Examiner relies on Burke for an alleged teaching of utilizing IBM Websphere.

The Cited Prior Art Does Not Anticipate the Claimed Invention

The MPEP and case law provide the following definition of anticipation for the purposes of 35 U.S.C. §102:

> "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." MPEP §2131 citing *Verdegaal Bros. v. Union Oil Company of California*, 814 F.2d 628, 631, 2 U.S.P.Q. 2d 1051, 1053 (Fed. Cir. 1987)

The Examiner Has Not Established a *Prima Facie* Case of Anticipation

As noted above, the present claimed invention includes locating a suitable coding module on a node contained within a computational grid and supplying a parsed description of an application to the node for further processing. It is well known in the art that a grid utilizes the resources of many separate computers, or nodes, connected by a network (e.g., the Internet) to solve large scale computational problems. This is advantageous as it provides a way to disperse coding modules

amongst nodes operationally connected in a grid for quick processing of application descriptions. By dispersing the modules, the computational power of individual nodes is better utilized.

In contrast, Hejlsberg teaches a single node system for processing a blueprint, or as defined by Hejlsberg, a domain-specific declarative programming language. This blueprint is passed to a known blueprint translator which parses, processes and generates a page of source code. This generated source code is then stored in a class library for subsequent use. Hejlsberg omits the presently claimed steps of locating a suitable coding module on a node contained within a computational grid and supplying said description (before being processed) to the located node for processing. In Hejlsberg, all processing is done locally at the blueprint translator without any search for or transfer to a node on a computational grid. These steps are important to the present claimed invention as the present invention is directed towards taking advantage of the combined power of a computational grid. Hejlsberg never mentions locating a suitable coding module on a node, whether the node is within a computational grid or not. In fact, Hejlsberg is completely silent on the concept of a computational grid wherein the computation grid includes a plurality of computers sharing computational resources. Locating a node within a computational grid is specifically claimed in the present invention and patentably defines the present invention as novel over the prior art including Hejlsberg.

In the Examiner's response to Applicant's Arguments, on page 22 of the Office Action, the Examiner states that "the Document Object Model (DOM) [of Hejlsberg] is the claimed computational grid containing nodes with coding modules. Hejlsberg et al. disclose that the DOM is used for further processing of the blueprint, which indicates that a suitable coding module on a node

is located within DOM and that source code is generated according to predetermined schemas, patterns, and/or hierarchal rules." Applicants respectfully disagree with the Examiner's interpretation of a DOM. A DOM is a platform and language independent standard object model for representing HTML, XML and other various related formats. An object model, in its simplest form, is a collection of objects or classes through which a computer program can examine and manipulate some specific piece of data. A DOM is merely a subset of the larger, generic term object model. DOMs are unique in that the collection of objects and classes are specific to producing a document, such as a web page using an HTML DOM, or a style sheet using an XML DOM. Hejlsberg provides no teaching or support for asserting that its DOM functions as a computational grid. Hejlsberg defines its DOM as merely a middle step between parsing a blueprint file and generating a code file.

Accordingly, each of the independent claims (Claims 1, 12, and 18), and all claims depending therefrom, patentably define over Hejlsberg and are in condition for allowance. The Examiner is respectfully requested to reconsider and withdraw the rejections of Claims 1-9 and 11-26 under 35 U.S.C. §102(e).

The Examiner Has Not Established a *Prima Facie* Case of Obviousness

As set forth in the MPEP:

> To establish a *prima facie* case of obviousness, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skilled in the art, to modify the reference or to combine reference teachings.
> MPEP 2143

The Examiner relies upon U.S. Patent No. 6,789,252 to Burke et al. ("Burke") to teach utilizing IBM Websphere as a specific web service. However, as discussed above, Hejlsberg fails to anticipate each of the independent claims (Claims 1, 12 and 18) by failing to locate a node within a computation grid as discussed above. The addition of any teachings of Burke fails to meet any deficiencies of Hejlsberg and therefore fails to disclose the presently claimed invention. The Examiner is respectfully requested to reconsider and withdraw the rejections of Claims 10 and 27 under 35 U.S.C. §103(a) as being unpatentable over Hejlsberg in view Burke.

Conclusion

The present invention is not taught or suggested by the prior art. Accordingly, the Examiner is respectfully requested to reconsider and withdraw the rejection of the claims. An early Notice of Allowance is earnestly solicited.

Respectfully submitted,

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